

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DAVID FLYNN,

Plaintiff,

v.

MICHAEL J. WELCH, *et al.*,

Defendants.

Civil Action Number: 1:21-cv-10256-IT

PLAINTIFF'S LOCAL RULE 16.1 CERTIFICATION

Pursuant to Local Rule 16.1(d)(3), Plaintiff David Flynn and his counsel certify that they have conferred:

1. With a view to establishing a budget for the costs of conducting the full course – and various alternative courses – of the litigation; and
2. To consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Dated: April 8, 2021

Respectfully submitted,

/s/ David Flynn

David Flynn

/s/ Michael Bekesha

Michael Bekesha

BBO No. 675787

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 9, 2021.

/s/ Michael Bekesha